

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

**JOHN BELLOCCHIO; and  
FETCH & MORE, Inc.,**

Plaintiffs,

v.

**THE KENOSHA GUARD;**  
**KEVIN MATHEWSON**, Commander of Kenosha Guard;  
**RYAN BALCH**, Member of Boogaloo Boys;  
**THE BOOGALOO BOIS;**  
**KYLE RITTENHOUSE;**  
**WOLVERINE WARRIORS;**  
**BRIAN HIGGINS;**  
**THE PROUD BOYS;**  
**GAVIN MCINNES**, Founder of the Proud Boys;  
**CENSORED.TV**, a U.S. corporation;  
**ENRIQUE TARRIO**, Chairman of the Proud Boys;  
**ERIC DOE**, Leader of Wisconsin Proud Boys Chap.;  
**BRAD DOE**, Deputy Commander of Wisconsin  
Chapter of the Proud Boys; and  
**AUGUSTUS SOL INVICTUS**, Commander of the  
Fraternal Order of Alt-Knights,

Defendants.

Civil Case No.  
2:20-cv-1589

**PLAINTIFF'S MOTION TO WITHDRAW COMPLAINT &  
DISMISS WITHOUT PREJUDICE**

COMES NOW the Plaintiff, by and through his attorney, and hereby requests that this Honorable Court grant his motion to withdraw the complaint filed in this case on October 19, 2020, and dismiss the suit without prejudice. In support whereof, he states the following:

Due to the extreme financial duress Defendants have placed him under, Plaintiff is unable to procure the funds to continue prosecuting this suit.

Therefore, he wishes to withdraw the complaint, and requests this Honorable Court dismiss the suit without prejudice, so it may be brought at another time.

WHEREFORE, Plaintiff requests the Court grant this motion to withdraw, and dismiss *Bellochio v. Kenosha Guard, et al.*, 2:20-cv-1589, without prejudice.

Respectfully submitted,

/s/ Jennifer Sirrine

Attorney for Plaintiffs

21st Century Law  
451 King Street  
P.O. Box 1504  
Littleton, MA 01460  
Reg. No. 706180  
(978) 616-4852  
j.d.sirrine@centurylaw.org